

REMARKS/ARGUMENTS

Claims 1-21 are pending in the present application. Claims 1, 5, 9, 15, and 16 are amended; and claim 21 is added. Claim 1 is amended to provide antecedent basis and consistency with similar independent claims 12 and 20. Claims 5, 9, 15, and 16 are amended to place claims 5-7, 9-10, and 15-18 in condition for allowance. Support for new claim 21 is located at least on page 8, line 25, through page 9, line 11. Reconsideration of the claims is respectfully requested.

I. Allowable Subject Matter

The Examiner has stated that claims 5-7, 9-10, and 15-18 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. In response, claims 5, 9, 15, and 16 have been rewritten to overcome this objection. Claims 6-7, 10, and 17-18 are dependent upon independent claims 5, 9, and 16, respectively. Therefore, claims 5-7, 9-10, and 15-18 are now in condition for allowance.

II. 35 U.S.C. § 102, Anticipation

The Examiner has rejected claims 1-4, 8, 11-14, and 19-20 under 35 U.S.C. § 102(e) as being anticipated by *Buxton et al., Graphical Keyboard*, U.S. Patent No. 6,094,197, July 25, 2000 (hereinafter *Buxton*). This rejection is respectfully traversed.

The Office Action states:

As per claim 1, Buxton shows a method for user input, the method comprising: receiving a user input (In fig.10), wherein the user input includes a gesture (in fig.10 second figure) that represents a plurality of characters (line across letter a-f in fig.10) and wherein a shape of the gesture (shape reversed I being drawn in fig.10) is related to positions of the plurality of characters within a keyboard layout (in fig.10 keyboard layout); identifying the plurality of characters associated with the gesture; and providing the identified string as text input(as shown in fig.10 and in col.6 lines 40-67) .

As per claim 2, Buxton shows identifying a string associated with the gesture includes performing pattern recognition on the gesture (in fig.10).

As per claims 3, 14 Buxton shows identifying a string associated with the gesture includes: identifying a starting position; and recording a character based on the starting position with respect to the keyboard layout (in col.7 lines 44-67).

As per claims 4, 8, 19 Buxton shows wherein identifying a string associated with the gesture includes: identifying a change of direction; and recording a character based on a position of the change of direction with respect to the keyboard layout (in fig.16 having different modes and options to write character).

As per claim 11, Buxton shows providing the identified string as input includes providing the identified string to an application (in fig.11).

Claims 12 have been rejected same as claim 1 since claim 12 is an apparatus of claim 1.

As per claim 13, Buxton shows the identification means includes means for performing pattern recognition on the gesture (in fig.10).

Claim 20 is rejected same as claim 1 since it is a computer program to the step of claims 1 and apparatus claim 12 using a program code or instruction to do the steps.

Office Action, dated October 31, 2006, pages 2-3.

Claim 1, which is representative of the other rejected independent claims 12 and 20 with regard to similarly recited subject matter, reads as follows:

1. A method for user input, the method comprising:
 - receiving a user input, wherein the user input includes a gesture that represents a plurality of characters and wherein a shape of the gesture is related to positions of the plurality of characters within a keyboard layout;
 - identifying a string of characters associated with the gesture; and
 - providing the identified string as text input.

A prior art reference anticipates the claimed invention under 35 U.S.C. § 102 only if every element of a claimed invention is identically shown in that single reference, arranged as they are in the claims. *In re Bond*, 910 F.2d 831, 832, 15 U.S.P.Q.2d 1566, 1567 (Fed. Cir. 1990). All limitations of the claimed invention must be considered when determining patentability. *In re Lowry*, 32 F.3d 1579, 1582, 32 U.S.P.Q.2d 1031, 1034 (Fed. Cir. 1994). Anticipation focuses on whether a claim reads on the product or process a prior art reference discloses, not on what the reference broadly teaches. *Kalman v. Kimberly-Clark Corp.*, 713 F.2d 760, 218 U.S.P.Q. 781 (Fed. Cir. 1983). Applicants respectfully submit that *Buxton* does not identically show every element of the claimed invention arranged as they are in the claims. Specifically, *Buxton* does not teach or suggest "receiving a user input, wherein the user input includes a gesture that represents a plurality of characters and wherein a shape of the gesture is related to positions of the plurality of characters within a keyboard layout," as recited in claims 1, 12, and 20. Additionally, *Buxton* does not teach or suggest "identifying a string of characters associated with the gesture," as recited in claims 1, 12, and 20.

Buxton is direct to a system and method for a graphical keyboard that benefits from the expressive power and intuitive ease of use associated with pen strokes and gestures, yet does not require complex character-recognition software. The graphical keyboard responds differently to different kinds of pen strokes. For example, lowercase "a" is entered by tapping a stylus on the "a" key of the graphical keyboard. Uppercase "A" is entered by an upward stroke initiated over the "a" key. Likewise, by stroking in other directions, a user can express other modifiers to the basic character, such as "control", "alt", "command," etc. Also, strokes in distinct directions can be used to express space, backspace, delete, and return characters, for example. Multiple strokes can be applied in sequence to a single key to express multiple modifiers. Visual feedback of pen strokes can be provided in the form of marks made by the pen. Pop-up menus can be used to provide help with and to facilitate memorization of command strokes

and stroke sequences. The graphical keyboard thus lets the expert user proceed by "feel," and prompts the novice user when and as necessary. *Buxton* does not teach or suggest "receiving a user input, wherein the user input includes a gesture that represents a plurality of characters and wherein a shape of the gesture is related to positions of the plurality of characters within a keyboard layout," as recited in claims 1, 12, and 20. Additionally, *Buxton* does not teach or suggest "identifying a string of characters associated with the gesture," as recited in claims 1, 12, and 20.

The Office Action refers to Figure 10 of *Buxton* in the rejection of claims 1, 12, and 20:

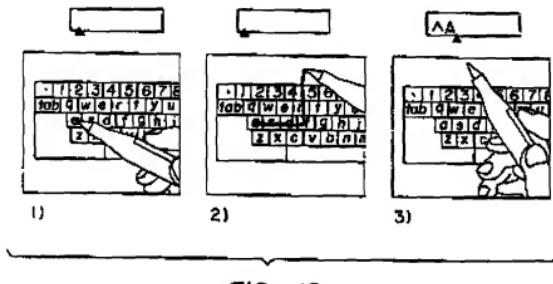


FIG. 10.

Buxton, Figure 10.

Buxton's Figure 10 is a series of views in which a user enters a control uppercase character by making a compound rightward-upward stroke on a key of the graphical keyboard. Figure 10 of *Buxton* does not teach or suggest "receiving a user input, wherein the user input includes a gesture that represents a plurality of characters and wherein a shape of the gesture is related to positions of the plurality of characters within a keyboard layout," as recited in claims 1, 12, and 20. In addition, Figure 10 of *Buxton* does not teach or suggest "identifying a string of characters associated with the gesture," as recited in claims 1, 12, and 20. To the contrary, Figure 10 of *Buxton* teaches a gesture that is used to identify only one character (a control uppercase A). *Buxton*'s system and method modifies a single character based on the gesture.

The Office Action refers to the following portion of *Buxton* in the rejection of independent claims 1, 12, and 20:

FIG. 10 shows that modifiers can be combined by making compound strokes that combine strokes of different directions. The series of three views of FIG. 10 shows a user entering a control uppercase character using the graphical keyboard of the invention. A

"control uppercase character" is produced on a conventional, mechanical keyboard by holding down the "shift" and "ctrl" modifier keys simultaneously while pressing a character key. Pressing the "shift" and "ctrl" keys while striking the key for the letter "a," for example, produces the character called "control-shift-a," which can also be written as "ctrl-A" or "A." On the graphical keyboard of the invention, the user can enter a control uppercase character by making compound rightward-upward stroke or mark on the desired key of the graphical keyboard.

In the first view of FIG. 10, the user places the pen or stylus on the key corresponding to the character to be entered (the key "a" corresponding to the character "A" in this example). The key is highlighted in the display. The character buffer is empty.

In the second view of FIG. 10, the user drags the pen a distance to the right and then a distance "upward"—that is, toward the topmost row of the keyboard. The user maintains contact between the pen point and the surface of the screen on which the keyboard image is displayed substantially throughout the rightward-and-then-upward motion. The display shows a line or mark where the user has dragged the pen. The key remains highlighted in the display. The character buffer remains empty at this stage, because the character to be entered has not yet been recognized.

Buxton, column 6, lines 40-67, column 7, lines 1-3.

This portion of *Buxton* discloses making compound strokes that combine strokes of different directions in order to combine modifications to a single character. This allows the user to enter a character such as "ctrl-A" or "control-shift-a." *Buxton*'s gesture does not represent or identify a plurality of characters. *Buxton*'s gesture is not related to positions of a plurality of characters on a keyboard layout. *Buxton* does not teach or suggest "receiving a user input, wherein the user input includes a gesture that represents a plurality of characters and wherein a shape of the gesture is related to positions of the plurality of characters within a keyboard layout," as recited in claims 1, 12, and 20. In addition, *Buxton* does not teach or suggest "identifying a string of characters associated with the gesture," as recited in claims 1, 12, and 20.

In view of the above, Applicants respectfully submit that *Buxton* does not teach each and every feature of independent claims 1, 12, and 20, as is required under 35 U.S.C § 102(e). In addition, *Buxton* does not teach each and every feature of dependent claims 2-4, 8, 11, 13-14, and 19 at least by virtue of their dependency on claims 1 and 12, respectively. Accordingly, Applicants respectfully request withdrawal of the rejection of claims 1-4, 8, 11-14, and 19-20 under 35 U.S.C § 102(e).

In addition to being dependent on their respective independent claims, amended claims 8 and 19 are also distinguished over the *Buxton* reference based on the specific features recited therein. Claim 8 is dependent on independent claim 1; and claim 19 is dependent on independent claim 12. *Buxton* does not teach or suggest "performing a spell check on the identified string," as recited in claims 8 and 19. *Buxton* does not even mention spell checking.

III. New Claim 21

In addition, new claim 21 is also distinguished over the *Buxton* reference based on the specific features recited therein. Claim 21 is dependent on independent claim 1. *Buxton* does not teach or suggest that "the gesture maintains a contact with a touch sensitive device while moving to each of the positions of the plurality of characters corresponding to the keyboard layout," as recited in claim 21. For example, in the present invention, a user places an implement, such as a stylus for example, in contact with the touch screen over a display of a first letter of a word. The user then drags the stylus, while in contact with the surface of the touch screen, to the next letter of the word, then to the next letter, and so on. To the contrary, *Buxton* only teaches a gesture for one character. *Buxton's* gesture includes an angle of a stroke that defines how to modify the one character, such as making the character uppercase or a control character.

IV. Conclusion

It is respectfully urged that the subject application is patentable over *Buxton* and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

/Gerald H. Glanzman/
Gerald H. Glanzman
Reg. No. 25,035
Yee & Associates, P.C.
P.O. Box 80233
Dallas, TX 75380
(972) 385-8777
Attorney for Applicants

GHG/VA